

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SIRI DIAZ, CAROLYN SIEGEL, TALIA
BUMB, BLERTA VIKKI, DANIELLE
OWIMRIN, on behalf of themselves and all others
similarly situated,

Plaintiffs,

-against-

SCORES HOLDING COMPANY, INC.; GO
WEST ENTERTAINMENT, INC. a/k/a SCORES
WEST SIDE; and SCORES ENTERTAINMENT,
INC., a/k/a SCORES EAST SIDE.

Defendants.

No. 07-8718 (RMB)

**DECLARATION OF ANJANA
SAMANT IN SUPPORT OF
MOTION FOR CONDITIONAL
CERTIFICATION AND COURT-
AUTHORIZED NOTICE
PURSUANT TO SECTION 216(b)
OF THE FLSA**

I, Anjana Samant, declare, upon personal knowledge and under penalty of perjury, pursuant to 28 U.S.C. Section 1746, that the following is true and correct:

1. I am an associate at Outten & Golden LLP, attorneys for Plaintiffs, and an attorney in good standing admitted to practice in the State of New York and before this Court. I make this declaration in support of Plaintiffs' Motion for Conditional Certification as an FLSA Collective Action and for Court-Authorized Notice Pursuant to Section 216(b) of the FLSA.

2. Attached as Exhibit A is a true and correct copy of Plaintiffs' Proposed Notice to Potential Plaintiffs.

3. Attached as Exhibit B is a true and correct copy of Plaintiffs' Amended Complaint, dated November 15, 2007 ("AC").

4. Attached as Exhibit C is a true and correct copy of the declaration of Talia Bumb, dated January 17, 2008 ("Bumb Dec.").

5. Attached as Exhibit D is a true and correct copy of the declaration of Siri Diaz, dated January 16, 2008 ("Diaz Dec.").

6. Attached as Exhibit E is a true and correct copy of the declaration of Susan Levin dated January 16, 2008 (“Levin Dec.”).

7. Attached as Exhibit F is a true and correct copy of the declaration of Carolyn Siegel dated January 17, 2008 (“Siegel Dec.”).

8. Attached as Exhibit G is a true and correct copy of the declaration of Blerta Vikki dated January 17, 2008 (“Vikki Dec.”).

9. Attached as Exhibit H is a true and correct print version of a webpage from Score’s website, last accessed on January 14, 2008, at <http://www.scoresholding.com/operations.htm> (“Scores Operations Webpage”).

10. Attached as Exhibit I is a true and correct print version of a webpage from Score’s website, last accessed on January 14, 2008, at the site <http://www.scoresholding.com/profile.htm> (“Scores Profile Webpage”).

11. Attached as Exhibit J is a true and correct copy of Scores Holding Co. Form 10QSB/A, filed with the Securities & Exchange Commission on May 23, 2007 (“Scores SEC filing”).

12. Attached as Exhibit K is a true and correct copy of Defendants’ correspondence to Judge Berman, dated December 7, 2007 (“Defendants’ Pre-motion Letter”).

13. Attached as Exhibit L is a true and correct copy of the “plain language” collective action notice proposed by the Federal Judicial Center, also available at http://www.fjc.gov/public/home.nsf/autoframe?openform&url_1=/public/home.nsf/inavgeneral?openpage&url_r=/public/home.nsf/pages/376.

14. Attached as Exhibit M is a true and correct copy of a Complaint filed by *inter alia* SHC on July 26, 2005, in Supreme Court of the State of New York.

Unpublished Decisions

15. Attached as Exhibit N is a copy of *Anglada v. Linens ‘n Things, Inc.*, No. 06 Civ. 12901, 2007 U.S. Dist. LEXIS 39105 (S.D.N.Y. Apr. 26, 2007).

16. Attached as Exhibit O is a copy of *Bursell v. Tommy's Seafood Steakhouse*, Civil Action No. H-06-0386, 2006 U.S. Dist. LEXIS 80526 (S.D. Tex. Nov. 3, 2006).

17. Attached as Exhibit P is a copy of *Carter v. Indianapolis Power & Light Co.*, IP 102 CV 01812, 2003 U.S. Dist. LEXIS 23398 (S.D. Ind. Dec. 23, 2003).

18. Attached as Exhibit Q is a copy of *Chan v. Sung Yue Tung Corp.*, 03 Civ. 6048 (GEL), 2007 U.S. Dist. LEXIS 7770 (S.D.N.Y. Feb. 1, 2007).

19. Attached as Exhibit R is a copy of *Chowdhury v. Duane Reade, Inc.*, No. 06 Civ. 2295, 2007 U.S. Dist. LEXIS 73853 (S.D.N.Y. Oct. 2, 2007).

20. Attached as Exhibit S is a copy of *Cuzco v. Orion Builders, Inc.*, 06 Civ. 2789 (SCR), 2007 U.S. Dist. LEXIS 21473 (S.D.N.Y. March 8, 2007).

21. Attached as Exhibit T is a copy of *Damassia v. Duane Reade, Inc.*, 04 Civ. 8819 (GEL), 2006 U.S. Dist. LEXIS 73090 (S.D.N.Y. Oct. 5, 2006).

22. Attached as Exhibit U is a copy of *Dominguez v. Don Pedro Restaurant*, 2:06 Civ. 241, 2007 U.S. Dist. LEXIS 6659 (N.D. Ind. Jan. 25, 2007).

23. Attached as Exhibit V is a copy of *Harrington v. Education Management Corp.*, No. 02 Civ. 0787, 2002 U.S. Dist. LEXIS 8823 (S.D.N.Y. May 17, 2002).

24. Attached as Exhibit W is a copy of *Jacobsen v. The Stop & Shop Supermarket Co.*, No. 02 Civ. 5915, 2003 U.S. Dist. LEXIS 7988 (S.D.N.Y. May 15, 2003).

25. Attached as Exhibit X is a copy of *Khalil v. The Original Homestead Restaurant, Inc.*, No. 07 Civ. 695, 2007 U.S. Dist. LEXIS 70372 (S.D.N.Y. Aug. 9, 2007).

26. Attached as Exhibit Y is a copy of *Krueger v. N.Y. Telephone Co.*, Nos. 93 Civ. 0178-79, 1993 U.S. Dist. LEXIS 9988 (S.D.N.Y. July 21, 1993).

27. Attached as Exhibit Z is a copy of *Legrand v. Education Management Corp.*, No. 03-9798, 2004 U.S. Dist. LEXIS 17696 (S.D.N.Y. Sept. 2, 2004).

28. Attached as Exhibit AA is a copy of *Masson v. Ecolab, Inc.*, No. 04 Civ. 4488, 2005 U.S. Dist. LEXIS 18022 (S.D.N.Y. Aug. 17, 2005).

29. Attached as Exhibit BB is a copy of *Sipas v. Sammy's Fishbox, Inc.*, 05 Civ. 10319 (PAC), 2006 U.S. Dist. LEXIS 24318 (S.D.N.Y. Apr. 24, 2006).

30. Attached as Exhibit CC is a copy of *Torres v. Gristede's Operating Corp.*, 04 Civ. 3316 (PAC), 2006 U.S. Dist. LEXIS 74039 (S.D.N.Y. Sept. 28, 2006).

31. Attached as Exhibit DD is a copy of *Zhao v. Benihana, Inc.*, No. 01 Civ. 1297 (KMW), 2001 U.S. Dist. LEXIS 10678 (S.D.N.Y. May 7, 2001).

32. Attached as Exhibit EE is a copy of *Hens v. ClientLogic Oper. Corp.*, No. 05 Civ. 381S, 2006 U.S. Dist. LEXIS 69021 (W.D.N.Y. Sept. 26, 2006).

Dated: New York, New York
January 18, 2008

/s/Anjana Samant
Anjana Samant (5163)
Outten & Golden LLP
3 Park Avenue, 29th Floor
New York, New York 10016
Telephone: (212) 245-1000
Facsimile: (212) 977-4005

Attorney for Plaintiffs